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FILED

JUL 17 2001

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE

AL RDC
WILLIAM T. RIALOP
CLERK

HIP HEALTH PLAN OF FLORIDA, INC., on
behalf of itself and all others similarly situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES and
AMERICAN HOME PRODUCTS
CORPORATION,

Defendants.

Class Action

Civil Action No. 01-1652

NOTICE OF MOTION TO
ENTER CASE MANAGEMENT
ORDER No. 1

UNITED FOOD AND COMMERCIAL
WORKERS LOCAL 56 HEALTH & WELFARE
FUND, on behalf of itself and all others similarly
situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES and
AMERICAN HOME PRODUCTS
CORPORATION,

Defendants.

Civil Action No. 01-1769

CARL M. WALLACE and BURT LAVIN, on
behalf of themselves and all others similarly situated,

Plaintiffs,

Civil Action No. 01-1771

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES and
AMERICAN HOME PRODUCTS
CORPORATION,

Defendants.

AMY REICHERT, on behalf of herself and all
others similarly situated,

Plaintiff,

Civil Action No. 01-1770

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES and
AMERICAN HOME PRODUCTS
CORPORATION,

Defendants.

STANLEY NEMSER, on behalf of himself and
all others similarly situated,

Plaintiff,

Civil Action No. 01-1943

v.

SCHERING-PLOUGH CORPORATION;
and AMERICAN HOME PRODUCTS
CORPORATION,

Defendants.

STANLEY NEMSER, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION; and
UPSHER-SMITH LABORATORIES,

Defendants.

Civil Action No. 01-1944

NORMAN SEABROOK, ISRAEL REXACH,
ELIAS HUSAMUDEEN, WILLIAM WASNICKI,
GUY ANDERSON, ROBERT SEABROOK,
STEVEN ROBINSON, ON BEHALF OF
CORRECTION OFFICERS BENEVOLENT
ASSOCIATION SECURITY BENEFITS
FUND, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES; AMERICAN
HOME PRODUCTS CORPORATION; and
ESI LEDERLE INC.,

Defendants.

Civil Action No. 01-2090

ROSE LIPSCOMB, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES; and
AMERICAN HOME PRODUCTS
CORPORATION,

Defendants.

Civil Action No. 01-2119

TEAMSTERS HEALTH & WELFARE FUND OF :
PHILADELPHIA & VICINITY, on behalf of :
itself and all others similarly situated, :

Plaintiffs, :

v. :

SCHERING-PLOUGH CORPORATION; :
UPSHER-SMITH LABORATORIES; and :
AMERICAN HOME PRODUCTS :
CORPORATION, :

Defendants. :

Civil Action No. 01-2191

NEW YORK STATE-WIDE SENIOR ACTION :
COUNCIL, INC.; and MASSACHUSETTS :
SENIOR ACTION COUNCIL, on behalf of :
themselves and all others similarly situated, :

Plaintiffs :

v. :

SCHERING-PLOUGH CORPORATION; :
UPSHER-SMITH LABORATORIES; and :
AMERICAN HOME PRODUCTS :
CORPORATION, :

Defendants. :

Civil Action No. 01-2726

LOUISIANA WHOLESALE DRUG CO., :
INC., on behalf of itself and all others :
similarly situated, :

Plaintiffs :

v. :

SCHERING-PLOUGH CORPORATION; :
UPSHER-SMITH LABORATORIES; and :
AMERICAN HOME PRODUCTS CORP., :
Defendants. :

Civil Action No. 01-2869

GEORGE BURNS, individually and on behalf of
all others similarly situated,

Plaintiffs

Civil Action No. 01-2943

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES; AMERICAN
HOME PRODUCTS CORPORATION; and
ESI LEDERLE, INC.

Defendants.

NOTICE OF MOTION TO ENTER CASE MANAGEMENT ORDER No. 1

TO: All Counsel of Record (See attached list)

PLEASE TAKE NOTICE that on the 10th of September, 2001, at 9:00 A.M., or as soon thereafter as the Court directs, Plaintiffs in Civil Actions Nos. 01-1652, 01-1769, 01-1771, 01-1770, 01-1943, 01-1943, 01-1944, 01-2090, 01-2119, and 01-2191 will move pursuant to Local Civil Rule 16.1(g) for a Case Management Order providing for the consolidation of related actions and the filing on a single consolidated complaint; establishing a Master Docket; approving the organization of Plaintiffs' counsel, including the appointment of lead counsel, liaison counsel, and an executive committee; initial scheduling of discovery; and scheduling for consideration of motions for class certification. In support of this motion, Plaintiff relies upon the submitted exhibits, and memorandum of law. Oral argument is not requested.

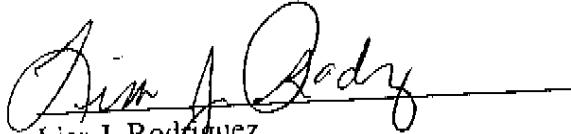
Plaintiffs have been advised that Defendants Schering-Plough Corporation and American Home Products Corporation consent to the entry of the Proposed Case Management Order, except that they make no comment regarding the organization of Plaintiffs' counsel.

Dated: July 17, 2001

Respectfully submitted,

RODRIGUEZ & RICHARDS, LLC

By:



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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HIP HEALTH PLAN OF FLORIDA, INC.,)
on behalf of itself and all others similarly)
situated,)

Plaintiff,)

v.)

SCHERING-PLOUGH CORPORATION;)
UPSHER-SMITH LABORATORIES; and)
AMERICAN HOME PRODUCTS)
CORPORATION,)

Defendants.)

Case No. 01-cv-1652

(JAG)

UNITED FOOD AND COMMERCIAL)
WORKERS LOCAL 56 HEALTH &))
WELFARE FUND, on behalf of itself and)
all others similarly situated,)

Plaintiff,)

v.)

SCHERING-PLOUGH CORPORATION;)
UPSHER-SMITH LABORATORIES; and)
AMERICAN HOME PRODUCTS)
CORPORATION,)

Defendants.)

Case No. 01-cv-1769

UNITED STATES
DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
JUL 17 2001
CLERK OF COURT
JUL 17 2001

CARL M. WALLACE and BURT LAVIN,)
on behalf of themselves and)
all others similarly situated,)

Plaintiffs,)

v.)

SCHERING-PLOUGH CORPORATION;)
UPSHER-SMITH LABORATORIES;)
and AMERICAN HOME PRODUCTS)
CORPORATION,)

Defendants.)

Case No. 2:01cv01771

AMY REICHERT,)
on behalf of herself and)
all others similarly situated,)

Plaintiff,)

v.)

SCHERING-PLOUGH CORPORATION;)
UPSHER-SMITH LABORATORIES;)
and AMERICAN HOME PRODUCTS)
CORPORATION,)

Defendants.)

Case No. 2:01cv01770

STANLEY NEMSER,)
on behalf of himself and)
all others similarly situated,)

Plaintiff,)

v.)

SCHERING-PLOUGH CORPORATION)
and AMERICAN HOME PRODUCTS)
CORPORATION,)

Defendants.)

Case No. 2:01cv01943

ROSE LIPSCOMB, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES; and
AMERICAN HOME PRODUCTS CORP.,

Defendants.

Case No. 2:01cv02119

TEAMSTERS HEALTH & WELFARE
FUND OF PHILADELPHIA AND
VICINITY, on behalf of itself and all others
similarly situated,

Plaintiff,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES; and
AMERICAN HOME PRODUCTS CORP.,

Defendants.

Case No. 01-2191

NEW YORK STATE-WIDE SENIOR
ACTION COUNCIL.; and
MASSACHUSETTS SENIOR ACTION
COUNCIL, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

SCHERING-PLOUGH CORPORATION;
UPSHER-SMITH LABORATORIES; and
AMERICAN HOME PRODUCTS CORP.,

Defendants.

Case No. 01-2726

LOUISIANA WHOLESALE DRUG CO.,)
INC., on behalf of itself and all others)
similarly situated,)

Plaintiffs,)

v.)

Case No. 01-2869

SCHERING-PLOUGH CORPORATION;)
UPSHER-SMITH LABORATORIES; and)
AMERICAN HOME PRODUCTS)
CORPORATION,)

Defendants.)

GEORGE BURNS, individually and on)
behalf of itself and all others)
similarly situated,)

Plaintiffs,)

v.)

Case No. 01-2943

SCHERING-PLOUGH CORPORATION;)
UPSHER-SMITH LABORATORIES;)
AMERICAN HOME PRODUCTS)
CORPORATION and ESI LEDERLE, INC.,)

Defendants.)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Plaintiffs' Notice of Motion to Enter Case Management Order No. 1, Memorandum in Support of Motion to Enter Case Management Order No. 1, Case Management Order No. 1, was served via Federal Express upon counsel listed below:

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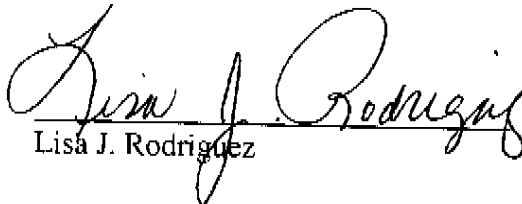
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Dated: July 17, 2001



Lisa J. Rodriguez